



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NS:TH
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 30, 2020

By ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (S-2) (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter in response to the Court's March 27, 2020 Order. The undersigned has been in contact with legal counsel for the Metropolitan Detention Center in Brooklyn ("MDC") and has been advised that the basis of the defendant's prior designation as "high-risk" in regard to the ongoing COVID-19 pandemic was solely due to his age (59) and not due to any medical condition. Since that time, based on guidance from the Centers for Disease Control and Prevention, the Bureau of Prisons has updated its list of high-risk inmates to include only those inmates aged 65 years or older.¹ Based on the updated criteria, the defendant is no longer on the list of at-risk inmates.

The government is further informed that legal counsel for the MDC has complied with the Court's Order and provided a copy of the defendant's medical records, by email, to Mr. Agnifilo and Ms. Geragos. Counsel for the MDC has also advised that a

¹ See, e.g., <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html> (updated March 26, 2020).

request for a legal call between the defendant and counsel has been granted and will be scheduled by Bureau of Prisons staff this week and as soon as feasible.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Tanya Hajjar
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cc: Clerk of Court (NGG) (by ECF)
Marc Agnifilo, Esq. (by ECF)
Teny Geragos, Esq. (by ECF)